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Federal Communications Commission  
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**Annual 47 C.F.R. 64.2009(e) CPNI Certification****EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2013

Date filed: February 11, 2014

Name of company covered by this certification: Dial Long Distance, Inc.

Form 499 Filer ID: 822542

Name of signatory: Edward J. Higgins

Title of signatory: Vice President

I, Edward J. Higgins, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may be subject to enforcement action.

Signed

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Dial Long Distance Inc.  
762. W. Ventura Blvd.  
Camarillo, CA 93010

Filer 499 ID: 822542

Statement of how the Company's procedures ensure how the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Dial Long Distance customer service consists of three full time people and myself as a backup. We do not have a billing presence, or any customer service on the internet as yet. The computers that run the customer billing and customer service are in a secured building which is also the headquarters of a security company. Entrance to the building is gained by cardkey. Security cameras on 24 hours, record all people entering and exiting the office. The customer service employees do not have access to the key for their office inside the building. I open and lock the customer service office for them daily.

Our long distance customer service is done with Profitec's "Omnibill" billing software. It is password protected and the levels of access are set to minimum levels. Customer service reps can add billing information, post payments, view rates, make notes, view invoices but cannot print invoices or make changes to rate tables etc. Only myself, with an administrative password can print a copy of a persons phone bill. Customer service computers have had their cd drives and USB ports disabled.

We only sell to businesses and customers subscribe to our service only with a written subscriber agreement signed by them and then faxed, mailed or emailed to us. We don't use third party verification. All orders must be in writing, signed and dated.

We require two forms of ID before an order is accepted. For customer security, customers must provide us a business Federal tax ID number or a social security number and provide us with an alpha numeric security code of at least 6 digits. This information is put into the notepad section of the billing software and does not appear on their invoices.


When a customer calls for questions regarding their billing, the security code they provided is required before information is retrieved. If they can't recall the password we call the customer back on the telephone number on record to continue the conversation. At this time a new password is established by the customer faxing or emailing a new password on a new subscriber agreement, signed and dated.

The customer service agents, as well as the sales manager were thoroughly trained as to when they are, or are not, authorized to use CPNI, and were given a copy of the Commissions rules regarding this. A written disciplinary process is in place in our Procedures Manual.

We do not market any aftermarket products to our existing customers other than the original long distance product.

I certify that I am an officer of the above-named reporting entity and I swear under penalty of perjury, that to the best of my knowledge, information and belief, all statements contained in this letter are true.

Sincerely,



Edward J. Higgins  
Dial Long Distance  
February 11, 2014